

Calderon, Wanda

From: Inglis, Andrew A (GE Corporate) <andrew.inglis@ge.com>
Sent: Friday, April 08, 2016 5:14 PM
To: Farrar, Kevin (DEC); Klawinski, Gary J
Cc: Gibson, Bob (GE Corporate); Kruppenbacher, Timothy A (GE Corporate); Cheplowitz, Michael; mmartin@ene.com; Daigle, William (DEC)
Subject: RE: Summary of Processing Facility Demob and Decommissioning Discussion

Kevin,

Your comments are noted and will be integrated into the design that will be submitted for further review and approval.

Thanks,

Andrew

From: Farrar, Kevin (DEC) [mailto:kevin.farrar@dec.ny.gov]
Sent: Friday, April 08, 2016 5:02 PM
To: Inglis, Andrew A (GE Corporate) ; Gary Klawinski (klawinski.gary@epa.gov)
Cc: Gibson, Bob (GE Corporate) ; Kruppenbacher, Timothy A (GE Corporate) ; 'Cheplowitz, Michael' ; Max Martin (mmartin@ene.com) ; Daigle, William (DEC)
Subject: RE: Summary of Processing Facility Demob and Decommissioning Discussion

Hello, Andrew;

My notes from the meeting are a bit different than yours. I don't recall EPA or DEC varying from the 3 foot separation, but rather that GE proposed to install sufficient fill in the basins to achieve 3 feet of separation, resulting in the need for the design to include manholes or other structures (forebays were discussed) to bring the water up to an invert elevation above the new basin floor elevation. I also recall that the design engineers said that they could look at increasing the size of the forebays to better approach the design manual needs for pretreatment in the North and South basin systems.

I think that we'll need to see the overall design before giving EPA any final opinion on varying from the design manual. However, as I stated at the meeting, the overall intention of the Department in reviewing this design is more to ensure water quality protection rather than strict enforcement of the design manual. As long as the design represents a reasonable approach toward achieving the objective of storm water management protective of water quality, utilizing the existing structures to the extent it is feasible to do so, then we would recommend EPA and GE move forward.

Kevin

Kevin L. Farrar

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From: Inglis, Andrew A (GE Corporate) [<mailto:andrew.inglis@ge.com>]
Sent: Friday, April 08, 2016 3:28 PM
To: Gary Klawinski (klawinski.gary@epa.gov)
Cc: Gibson, Bob (GE Corporate); Kruppenbacher, Timothy A (GE Corporate); Farrar, Kevin (DEC); 'Cheplowitz, Michael'; Max Martin (mmartin@ene.com)
Subject: Summary of Processing Facility Demob and Decommissioning Discussion

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Gary,
Follows is a summary of yesterday afternoon's discussion regarding the processing facility demob and decommissioning items requiring EPA input.

We reviewed Arcadis' draft design for the stormwater (SW) basins, specifically the retention basin at the wharf and the North and South infiltration basins. We asked if variances would be acceptable from the NYSDEC Stormwater Management Design Manual requirements for the following items:

1. The 10 acre max drainage area requirement. This was viewed as acceptable by EPA and NYSDEC and it was also suggested that the North infiltration basin could be viewed as 2 separate basins and that might allow the average drainage area per basin to be less than 10 acres
2. The separation from groundwater (GW) table of at least 3 feet. With the placement of the additional proposed fill in the basins to maximize the separation from GW EPA and NYSDEC viewed the variance as acceptable.
3. Design off-line if SW is conveyed by a storm drain pipe. This requirement was viewed by EPA and NYSDEC as not applicable to the processing facility SW basins.
4. 100% pretreatment with $f_c > 5.0$ inches/hour. A variance was viewed as acceptable by EPA and NYSDEC.

We were asked by EPA and NYSDEC to review the potential for the underdrains to backfeed storm water into the GW table. We reviewed the record drawings and can confirm that the underdrains are not connected to the SW pipes. Regardless, we will integrate a method to minimize the potential for SW to enter the underdrains (e.g. by grouting or by installing backflow preventers to the underdrain pipes at potential entryways).

We were also asked by EPA to consult with NYSCC regarding the proposed design for the overflow channel to feed into the Lock 8 diversion canal. We will do this before submitting the design to EPA.

Based on the discussion we will finalize the SW basin design and submit next week to EPA for review and approval.

We reviewed the SW basin decommissioning approach and understand that the approach is acceptable to EPA. We will develop measures to ensure that stormwater events that occur during the decommissioning of the SW basins can be adequately contained/handled.

NYSDEC stated that the SW discharge requirement will be non-detect using the EPA 608 method with a method detection limit of 0.065 ug/L.

We reviewed the proposed approach to cleaning the railcar loading track. Subject to review of sample results and field oversight of effectiveness, it was agreed that removal of potentially contaminated sediment from rails, ties and ballast to a visual clean standard would be acceptable. We discussed using a vacuum method to remove visible sediment from ballast so as to minimize the amount of ballast removed from the rail tracks.

We reviewed the proposed approach to cleaning and resealing joints and cracks. EPA requested that we conduct sampling of subbase material beneath the pavement in representative areas where joints seals have failed in areas that

saw frequent contact with contaminated sediment. It was agreed that 5-6 such locations would be sampled by GE at the beginning of next week with location confirmation with EPA representatives in the field. Tentative locations were identified along the loading track in front of the filter cake enclosures, great lawn area and coarse material staging area and at the north and south wharf unloading areas. Sample results will be ready to review with EPA during a site visit on Wednesday of next week to finalize the approach to cleaning and resealing joints and cracks. It was also agreed that GE can commence field delineation of joints that are clean and with intact seals. It was agreed that wall joints will not need to be sampled or reviewed however joints seals at locations where wall joints meet the ground will need to be reviewed by GE.

Please let me know ASAP if this email incorrectly characterizes our discussion.

Thanks,

Andrew

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